

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

TANISIA N. BAKER, a resident of Georgia

Plaintiff,

v.

CARL WEBER, a resident of New York,
individually and as officer of URBAN
BOOKS, LLC, URBAN BOOKS MEDIA,
LLC and KENSINGTON PUBLISHING
CORPORATION, URBAN BOOKS, LLC,
d/b/a URBAN AUDIOBOOKS, a New York
limited liability company, URBAN BOOKS
MEDIA, LLC, a New York limited liability
company; KENSINGTON PUBLISHING
CORPORATION a New York corporation,
VICKIE STRINGER, individually and as an
officer of VICKIE STRINGER
PUBLISHING LLC d/b/a TRIPLE CROWN
PUBLICATIONS, VICKIE STRINGER
AGENCY LLC d/b/a TRIPLE CROWN
PUBLICATIONS, VICKIE STRINGER
PUBLISHING LLC d/b/a TRIPLE CROWN
PUBLICATIONS and VICKIE STRINGER
AGENCY LLC d/b/a TRIPLE CROWN
PUBLICATIONS.

Defendants.

Civil Action No. 1:19-cv-01093 (JPC)

**NOTICE OF MOTION FOR DEFAULT
JUDGMENT**

PLEASE TAKE NOTICE that, upon the annexed declaration of Tanisia N. Baker, dated April 2, 2020, the annexed declaration of Francelina M. Perdomo, dated December 31, 2020, and all exhibits attached thereto, and the accompanying memorandum of law, as well as all pleadings, memoranda, and proceedings held herein, Plaintiff Tanisia N. Baker will move this Court on February 8, 2021, at 2:00 p.m. via telephone, or at a time and date to be set by the Court, granting Plaintiff's motion for a default judgment against Vickie Stringer, Vickie Stringer Publishing, LLC

d/b/a Triple Crown Publications, and Vickie Stringer Agency LLC d/b/a Triple Crown Publications (the “Defaulting Defendants”), pursuant to Fed. R. Civ. P. 55(b)(2), as follows:

1. Awarding Plaintiff damages for breach of contract from January 1, 2010 to October 10, 2011 in the amount of \$115,650.67, plus statutory interest from October 10, 2011 until the filing of this Complaint, against Vickie Stringer, Vickie Stringer Publishing, LLC, and Vickie Stringer Agency, LLC, jointly and severally;
2. Awarding Plaintiff damages for unjust enrichment from October 2011 until October 20, 2014 in the Amount of \$189,246.60, plus statutory interest from October 20, 2014 until the filing of this Complaint, against Vickie Stringer, Vickie Stringer Publishing LLC, and Vickie Stringer Agency, LLC, jointly and severally;
3. Awarding a default judgment in favor of Plaintiff and against Vickie Stringer for Plaintiff’s cause of action for fraud;
4. Awarding a default judgment in favor of Plaintiff and against Vickie Stringer Publishing, LLC and Vickie Stringer Agency, LLC for Plaintiff’s cause of action for civil conspiracy to commit fraud;
5. Declaring the Publishing Agreement dated November 1, 2003 terminated as of October 10, 2011 and the copyrights to the novels “Sheisty” and “Still Sheisty” reverted back to Plaintiff as of that date;
6. Declaring that Triple Crown Productions, LLC did not have authority to license the novels “Sheisty” and “Still Sheisty” in October 2014; and
7. Awarding Plaintiff such other and further relief as this Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that any opposing affidavits shall be filed no later than January 28, 2021, and any reply shall be filed no later than February 4, 2021, pursuant to the briefing schedule Ordered by the Court on December 16, 2020.

Dated: December 31, 2020
New York, N.Y.

GALLET, DREYER & BERKEY, LLP

By: /s. _____
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